

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:21CR0564 JAR
)	
JAMES MALONEY,)	
)	
Defendant.)	

GOVERNMENT'S RESPONSE TO DEFENDANT'S MOTION FOR RELEASE

COMES NOW the United States of America, by and through its attorneys Sayler Fleming, United States Attorney for the Eastern District of Missouri, and Colleen C. Lang, Assistant United States Attorney for said District, and files this response to the Defendant's Motion to Reconsider the Detention Order (Doc. #27).

The defendant in this case filed a motion requesting the Court reconsider the detention order, and specifically, he asks to be released on May 7, 2022. The Government is not opposed to the defendant being released from custody on May 7, 2022, because he will have completed the jail sentence that is recommended by the Government at that time. However, due to the bond violations previously incurred by the defendant, the Government requests that the defendant abide by strict conditions of pre-trial release while awaiting sentencing. This includes all the conditions laid out in the Order Setting Conditions of Release by the Western District of New York (Doc. #5), a curfew, and to participate in GPS (Global Positioning Satellite) monitoring. The Government further emphasizes that these listed conditions in the earlier Pre-Trial Release Order (Doc. #5) be ordered again: (l) no contact with Ms. Kolleen Simmons, (q) refrain from any use of alcohol, (s) submit to testing to determine if prohibited

substances are being used; and (t) participation in inpatient or outpatient substance abuse therapy.

Wherefore, the Government is not opposed to the defendant's release on May 7, 2022, if aforementioned conditions of release are imposed.

Respectfully submitted,

SAYLER FLEMING
United States Attorney

/s/ Colleen C. Lang
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CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2022, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Julie Clark, attorney for defendant.

/s/ Colleen C. Lang
COLLEEN C. LANG, #56872MO
Assistant United States Attorney